ALABAMA PUBLIC SERVICE COMMISSION

COUNTY OF Fulton
STATE OF Georgia

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Alphonso J. Varner, who being by me first duly sworn deposed and said that he/she is appearing as a witness on behalf of BellSouth Telecommunications, Inc. before the Alabama Public Service Commission in Docket No. 29054, IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II – Local Switching for Mass Market Customers), and if present before the Commission and duly sworn, his/her statements would be set forth in the annexed direct testimony consisting of 45 pages and 4 exhibits.

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 14th DAY OF JANUARY, 2004

Notary Public

LINDA M. HOBBS NOTARY PUBLIC GWINNETT COUNTY, GA

Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2007

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF ALPHONSO J. VARNER

BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION

FILED JANUARY 20, 2004

DOCKET NO. 29054 PHASE II

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is Alphonso J. Varner. I am employed by BellSouth as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Florida State University in 1972 with a Bachelor of Engineering Science degree in systems design engineering. I immediately joined Southern Bell in the division of revenues organization with the responsibility for preparation of all Florida investment separations studies for division of revenues and for reviewing interstate settlements.

Subsequently, I accepted an assignment in the rates and tariffs organization with responsibilities for administering selected rates and tariffs including preparation of tariff filings. In January 1994, I was

appointed Senior Director of Pricing for the nine-state region. I was named Senior Director for Regulatory Policy and Planning in August 1994. In April 1997, I was named Senior Director of Regulatory for the nine-state BellSouth region. I accepted my current position in March 2001.

Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to:

- Demonstrate to the Alabama Public Service Commission ("the Commission") that, based on performance data for the last twelve months (November 2002 through October 2003), BellSouth's Loop Provisioning performance, including Hot Cuts, does not pose a barrier to market entry for Competitive Local Exchange Carriers ("CLECs") seeking to serve customer locations with voice-grade loops;
- Propose changes to the existing performance measurements plan to produce even more performance data to increase performance monitoring of BellSouth's batch hot cut process and the coordinated and non-coordinated hot cuts performed by BellSouth.
- Propose changes to the Self Effectuating Enforcement Mechanism (SEEM) related to hot cuts.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. My testimony is organized into three major sections. Section I primarily contains overall loop performance data for a comprehensive set of

Ordering, Provisioning, and Maintenance & Repair measures. In that section, I also briefly address cross-connect and collocation performance. In Section II, I concentrate on loop performance specifically related to hot cuts, including batch hot cuts, to demonstrate BellSouth's ability to perform these conversions in an effective and timely manner. Finally, in Section III, I will discuss BellSouth's proposed changes and additions to performance measures and SEEM, if it receives unbundled switching relief.

I. BELLSOUTH'S CURRENT LOOP PROVISIONING PERFORMANCE

A. BellSouth's Performance Measures

Q. WHAT EMPIRICAL EVIDENCE DOES BELLSOUTH PRESENT TO SHOW THAT BELLSOUTH'S LOOP PROVISIONING PERFORMANCE IS NOT AN OPERATIONAL BARRIER TO CLECS ENTERING THE MARKET WITHOUT UNBUNDLED CIRCUIT SWITCHING?

A. My testimony presents performance data generated by measurements approved by this Commission to demonstrate that loop provisioning is not an operational barrier to UNE-Loop (UNE-L) market entry. Data are provided for the period November 2002 through October 2003. A detailed discussion of the Alabama performance results is contained in Exhibit AJV-1.

In addition, because there may be instances where the volumes reported in Alabama are low for the sub-metrics provided in this filing, I have also provided the performance results filed on December 23, 2003 with the Georgia Public Service Commission in a similar proceeding (Docket No. 17730-U) attached as Exhibit AJV-4. This will provide the Commission with supplementary information in cases where the volumes in Georgia may be more meaningful than the Alabama volumes.

Q. DO THE CLECS HAVE EMPIRICAL EVIDENCE TO DEMONSTRATE BELLSOUTH'S ABILITY TO PROVIDE UNBUNDLED LOOPS?

A. Yes. The CLECs have access to most of the CLEC aggregate data that I present here, and can collect data on their own transactions with BellSouth. While I obviously have not seen the CLECs' testimony in this proceeding, past proceedings indicate that the CLECs do not produce data of their own or utilize the CLEC aggregate data produced by BellSouth to comment on BellSouth's performance. Instead, they typically rely on unsupported anecdotal evidence or baseless guesses about the future to allege poor performance by BellSouth. If that pattern continues in this proceeding, the Commission should disregard the CLECs' testimony and focus solely on the objective evidence of performance that I present here.

Q. WHAT PROCESSES DO YOU INCLUDE IN LOOP PROVISIONING DATA?

A. In order to demonstrate that BellSouth provides CLECs with access to unbundled loops in a manner such that CLECs are not impaired, the loop provisioning data provided in this filing include the processes involved in providing CLECs unbundled loops from beginning to end. Therefore, BellSouth provides data herein not only for measurements associated with the installation of voice grade loops as defined in the "Provisioning" category of the SQM, but for measurements in the Ordering and Maintenance & Repair categories as well. These measurement performance results show that BellSouth responds to CLEC loop orders accurately and timely and performs maintenance and repair activities in a nondiscriminatory manner. Also, because UNE loops are terminated in collocation spaces, data for collocation performance are included.

Q. PLEASE DESCRIBE THE SOURCE OF THE DATA USED IN YOUR TESTIMONY.

A. The data provided in this filing are produced by the Performance Measurement Analysis Platform (PMAP), which is the same system utilizing the same SQM that produces these data for this Commission, the Commission staff, the Federal Communications Commission ("FCC") and the CLECs each month. The performance results are produced by the same process that yielded the data relied upon by this Commission and

the FCC to conclude that BellSouth met its section 271 obligations. PMAP has undergone an extremely thorough third party audit conducted by Bearing Point over multiple years. The metrics audit was concluded in Florida on July 30, 2002 and in Georgia on June 6, 2003 with no significant adverse findings in either state.

Q. WHAT VALUE DOES THE DATA PROVIDED HAVE IN DEMONSTRATING THAT UNBUNDLED LOOP PROVISIONING, INCLUDING HOT CUTS, WILL NOT BE AN OPERATIONAL BARRIER FOR CLECS IF SWITCHING IS NO LONGER A UNE?

A. As discussed in the testimony of BellSouth witness Mr. Ken Ainsworth, the loop provisioning processes used by BellSouth in the past will continue to be used in the future. From BellSouth's proven performance track record, the Commission can and should infer that BellSouth's performance will continue at a high level in the future. After all, it has been over a year since BellSouth entered the interLATA market in Alabama, and BellSouth's performance has remained consistently high. Moreover, new measures have been added and existing measures revised to enable this Commission to evaluate even more data on BellSouth's loop provisioning processes.

Q. WHAT LOOP PROVISIONING MEASUREMENTS HAS BELLSOUTH INCLUDED?

A. In addition to the measurements specifically related to hot cuts, which are discussed in the next section of my testimony, BellSouth has included the following SQM measures that cover the major processes associated with Ordering, Provisioning and Maintenance & Repair of UNE Loops in Alabama. In some cases, the same process is reflected either partially or wholly in multiple measures. In these cases, the multiple measures are included.

- Ordering
    i. Reject Interval - Fully Mechanized, Partial Mechanized and Non Mechanized
    ii. FOC Timeliness - Fully Mechanized, Partial Mechanized and Non Mechanized
    iii. FOC and Reject Response Completeness - Fully Mechanized, Partial Mechanized and Non Mechanized
    iv. Flow Through – UNE products
    v. Service Inquiry with Firm Order
- Provisioning
    i. Mean Held Order Interval
    ii. Average Jeopardy Notice Interval (Mechanized)
    iii. % Jeopardy Notice >= 48 Hours (Mechanized)
    iv. Order Completion Interval

v. Missed Installation Appointments

vi. Provisioning Troubles within 30 Days

vii. Average Completion Notice Interval (Mechanized)

viii. Cooperative Test Attempts for DSL

ix. Service Order Accuracy (Design & Non-Design)

x. Trunk Blocking

- Maintenance & Repair

  i. Missed Repair Appointments

  ii. Customer Trouble Report Rate

  iii. Maintenance Average Duration

  iv. Repeat Troubles within 30 Days

- Collocation

  i. Collocation Average Response Time

  ii. Collocation Average Arrangement Time

  iii. Collocation Percent of Due Dates Missed

Q. WHICH PRODUCTS ARE INCLUDED WITHIN THE UNE LOOP PERFORMANCE DATA?

A. BellSouth has included performance data for virtually all of the UNE loops that CLECs have ordered and would be expected to continue ordering to provide qualifying service to mass-market customers, which include:

- xDSL – this includes ADSL, HDSL and Unbundled Copper Loop (UCL), except UCL-Non Design (ND)
- Unbundled Cooper Loop – Non-Design (UCL-ND)

- UNE ISDN Loops – this includes Basic Rate Interface (BRI), Primary Rate Interface (PRI) and UDC
- UNE 2W Analog Loops Design with and without LNP
- UNE 2W Analog Loops Non Design with and without LNP
- Enhanced Extended Links (EELs)
- Local Interconnection Trunks

Of course, the Commission has data on any other loop products in which it may be interested.

Q. WHY DID BELLSOUTH INCLUDE A YEAR OF DATA WITH THIS FILING?

A. BellSouth wanted to demonstrate clearly and unequivocally that its performance has met, and will continue to meet, its obligations under the Telecommunication Act of 1996 ("the Act"). As the Commission will see, BellSouth's performance today is substantially the same (and in many cases better) than when this Commission and the FCC approved BellSouth's application to provide interLATA long distance service. Consequently, there is no doubt that BellSouth provides today, as it provided at the time of its 271 application, non-discriminatory, timely and efficient access to UNE loops. To reach a different conclusion today would directly conflict with the Commission's conclusions in endorsing BellSouth's application for interLATA authority in Alabama.

Q. ARE THERE ANY NEW PRODUCTS THAT CLECS WILL BE ABLE TO ORDER FOR WHICH DATA ARE NOT CURRENTLY AVAILABLE?

A. Yes. Although BellSouth currently allows CLECs to provision their own "co-carrier cross-connects" that allow two or more CLECs to interconnect their collocation spaces in a BellSouth central office, BellSouth plans to offer a new product to help facilitate this interconnection if the CLECs want BellSouth to perform this work, called "Co-Carrier Cross- Connect." This product is discussed in Ms. Kathy Blake's testimony and will be a federal tariff offering, which will provide for the installation of jumper patch cords between the two tie pairs connecting the Physical Collocation arrangements of two CLECs in BellSouth's Central Offices. The Co-Carrier Cross-Connect service provides a one-to-one dedicated transmission path between two CLECs' collocation arrangements located in the same Central Office at two-wire, four-wire, DS1, DS3, and fiber optic levels. Since this is a tariff offering instead of a UNE, data for this product are not captured.

The cross-connect process is a simple procedure that is already very much a part of current loop provisioning activities. Loop provisioning requires installation of cross connects between BellSouth equipment and CLEC collocation space, and performance of this activity is already reflected in the measurement data. There is nothing peculiar to cross-connects that involve CLEC-to-CLEC requests compared to BellSouth to

CLEC connections that would impact the process adversely. Consequently, with the understanding that this type of activity is already reflected in the loop provisioning data provided in this filing, the Commission has everything that it needs to evaluate the ability of CLECs to effectively serve their targeted customers in the absence of unbundled switching.

B. BellSouth's Performance Results

Q. WHAT WAS BELLSOUTH'S ORDERING TIMELINESS AND COMPLETENESS PERFORMANCE FOR UNE LOOPS FOR THE PAST 12 MONTHS IN ALABAMA?

A. Ordering timeliness and completeness performance is reflected in the Reject Interval, FOC Timeliness, and FOC and Reject Completeness measures. The Reject Interval measure shows the extent to which a Local Service Request ("LSR") that contained an error by the CLEC was returned by BellSouth in a timely manner to the CLEC for correction. FOC Timeliness results show whether BellSouth converted an LSR submitted by a CLEC into the service order necessary to perform the requested action within the timeframes established by this Commission. FOC and Reject Response Completeness performance indicates the extent to which a CLEC received a response to each valid LSR that it submitted.

Total Rejected LSRs

The following tables provide a summary by month of BellSouth's performance on these three metrics (including fully mechanized, partially mechanized and non-mechanized LSRs) for UNE Loop LSRs that were submitted by CLECs during the latest 12 months. As previously stated, Exhibit AJV-1 contains a detailed breakdown of the ordering sub-metrics included in the following tables.

% OF REJECTED LSRs MEETING REJECT INTERVAL BENCHMARKS			
Month	**# LSRs Rejected**	**# Rejected LSRs Meeting Benchmark**	**Percentage Meeting Benchmark**
Nov '02	73	63	86%
Dec '02	111	105	95%
Jan '03	148	134	91%
Feb '03	72	70	97%
Mar '03	67	67	100%
Apr '03	61	54	89%
May '03	63	60	95%
Jun '03	64	64	100%
Jul '03	78	69	88%
Aug '03	57	52	91%
Sep '03	114	112	98%
Oct '03	129	124	96%
TOTAL	**1037**	**974**	**94%**

During this 12-month period (November 2002 to October 2003), the average reject interval for all rejected LSRs for Fully Mechanized LSRs with errors rejected was 1 hour on average (against a benchmark of 1 hour). The average reject interval was 6 hours 25 minutes for Partially Mechanized LSRs (against a benchmark of 10 hours) and 6 hours 24 minutes for Non-Mechanized LSRs (against a benchmark of 24 hours).

Fully Mechanized

For those Fully Mechanized Rejected LSRs for which BellSouth did not meet the one-hour benchmark, BellSouth conducted a detailed root cause analysis of the process. The root cause analysis identified three issues that account for a significant portion of the LSRs that are rejected back to the CLEC and missed the 1-hour benchmark, all of which have been addressed. These three issues and their corresponding status are as follows:

ISSUE	STATUS
1. Errors are being detected with Listing LSRs. When a CLEC sends in an LSR for a Listing on a new account and completes the LSR properly, a FOC will be returned. However, if that account is found to be already active, then the order cannot be provisioned. The LSR is manually rejected and returned to the CLEC. If the LSR was submitted as a record only change to the directory listing, this would not be an issue. A Feature was implemented that will autoclarify the error prior to issuance of an FOC for this condition.	1. Feature implemented with Release 12.0 on 3/30/03.
2. Errors are being detected for LSRs that are Planned for Manual Fallout, but are being counted as Fully Mechanized. Such LSRs are designed to be worked by a service representative. If a CLEC calls regarding an LSR and the service representative retrieves the record outside of their normal process for retrieving orders, the LSR is not properly counted as Partially Mechanized because the proper service representative information is not populated and PMAP counts the LSR as Fully Mechanized. The LSR does not reflect that it was handled by the service representative and therefore is counted as fully mechanized.	2. Feature implemented with Release 13.0 on 6/22//03 to properly count this LSR as partially mechanized.
3. Errors are being detected for LSRs with errors that require manual intervention, but are being counted as Fully Mechanized. LSRs are submitted, but then encounter an error that cannot be handled by the system. The LSR is manually rejected and returned to the CLEC.	3. Feature implemented with Release 13.0 on 6/22//03 to properly count this LSR as partially mechanized.

The previous chart reported BellSouth's performance in the timely returning of Rejects based on Total Rejects (*i.e.*, Fully Mechanized, Partially Mechanized and Non-Mechanized). If we only look at Fully

Mechanized Rejected LSRs, with the implementation of Release 13.0 effective with May 2003 data, BellSouth has met the 1-hour benchmark for 96% of the fully mechanized rejected LSRs for May through October 2003.

Partially Mechanized Rejected LSRs

The Alabama SQM requires that BellSouth meet a benchmark for partially mechanized reject notices of 85% returned within 10 hours or less. BellSouth made an average of 88% over this period within 10 hours.

To address the remaining LSRs that were not returned within the 10-hour benchmark, BellSouth conducted a detailed raw data analysis that has revealed three areas associated with the mechanized portion of the partially mechanized LSRs:

- BellSouth experienced delays in processing LSRs submitted via the EDI system. During September and October 2003, this problem was corrected. The EDI CPUs and hard drives were replaced as well as additional CPU capacity installed. Also, additional pathways between the EDI translator and down stream Legacy systems were added. Finally, the electronic processing of certain administrative and archival activities was removed from the EDI translator to reduce overall processing time of the LSRs.
- Some LSRs experience delays in resolving incorrect connecting facility assignments (CFA) by the CLECs. BellSouth has determined that when an incorrect CFA is provided, it is being assigned an error status for further correction. Additional analysis is being performed to

determine if the resolution is being delayed by a system problem or if the service representatives are not handling the corrections in a timely manner.

- LSRs are dropping out for manual handling because of an error discovered after a FOC was returned to the CLEC. There are instances where an error is discovered as the Service Order begins to process through the provisioning systems. Due to the way the ordering and provisioning systems interact, it is not feasible for the order processing systems to query the provisioning system to detect these errors, prior to sending the FOC. Thus, when the error is detected as the Service Order begins to process, the reject is returned to the CLEC, but the time interval is measured from when the LSR was first received, resulting in an unusually long reject interval. It may be appropriate to exclude these types of rejects from the reject interval measurement and this exclusion can be addressed in the next periodic review of measurements. There are only small quantities of cases where the types of conditions that cause BellSouth to miss the standard occur, averaging about 65 per month. These volumes make it extremely difficult to duplicate the event that caused the problem, so that the problem can be corrected. Importantly, the small volume of misses indicates that performance is not having a significant adverse impact on CLECs.

Q. HOW IS BELLSOUTH'S FOC TIMELINESS PERFORMAMCE?

A. As set forth in the chart below, BellSouth has met the benchmark established by the Commission on average for 97% or more of the LSRs submitted for the past 12 months.

% OF FOCs MEETING FOC TIMELINESS BENCHMARKS			
Month	**# Total FOCs Returned to CLEC**	**# FOCs Meeting Benchmark**	**Percentage Meeting Benchmark**
Nov '02	251	246	98%
Dec '02	433	427	99%
Jan '03	375	371	99%
Feb '03	285	283	99%
Mar '03	318	307	97%
Apr '03	343	333	97%
May '03	280	264	94%
Jun '03	272	265	97%
Jul '03	374	359	96%
Aug '03	253	248	98%
Sep '03	318	302	95%
Oct '03	371	363	98%
TOTAL	**3873**	**3768**	**97%**

Like the reject interval performance data, the average time to return all FOCs was generally less than the benchmark standard. During this 12-month period (November 2002 to October 2003), the average FOC interval was: 45 minutes for Fully Mechanized LSRs, against a benchmark of 3 hours; 6 hours 16 minutes for Partially Mechanized LSRs, against a benchmark of 10 hours; and, 6 hours 45 minutes for Non-Mechanized LSRs, against a benchmark of 36 hours.

The area where BellSouth is missing the standard is in Partially Mechanized FOCs. To address the remaining LSRs that were not returned within the 10-hour benchmark, BellSouth conducted a detailed raw data analysis that has revealed three areas associated with the mechanized portion of the partially mechanized LSRs:

- A number of FOCs were entered into the system within the benchmark but were not counted correctly due to repeated attempts to respond to the CLEC. BellSouth met its requirement of initially returning the FOC within the 10-hour benchmark. Because of a system error, however, the performance was stated incorrectly. The issue does not affect BellSouth's performance for returning the FOC to the CLEC; it is just understating BellSouth's performance.
- BellSouth experienced delays in processing LSRs submitted via the EDI system. This is the same issue discussed above concerning rejects.
- Some CLECs are requesting that certain auto clarified (rejected) LSRs be corrected and processed without the CLEC resubmitting a new version of the existing LSR. In specific cases, some LSRs are being corrected and put into the ordering systems without receiving a new LSR from the CLEC. This causes the FOC to exceed the 10-hour benchmark. This is due to the fact that the beginning timestamp is not changed from the time the LSR was initially submitted by the CLEC, and as a result the entire time is included in the interval. This interval will almost always exceed the 10-hour FOC benchmark. In an effort to

provide good customer service, BellSouth is meeting the request of the CLECs, but this causes the FOC benchmark to be exceeded.

Q. HOW IS BELLSOUTH'S PERFORMANCE ON FOC AND REJECT RESPONSE COMPLETENESS?

A. BellSouth has returned FOCs and/or rejects for 84% or better (an average of 96%) of the UNE Loop LSRs that were submitted by CLECs during the latest 12 months as depicted in the following chart.

% OF FOC & REJECT RESPONSES RETURNED TO CLECs (95% BENCHMARK)			
Month	**# Total LSRs Submitted**	**# Responses Returned**	**Percentage of Total Returned**
Nov '02	302	298	99%
Dec '02	530	524	99%
Jan '03	515	496	96%
Feb '03	348	333	96%
Mar '03	370	358	97%
Apr '03	394	380	96%
May '03	330	320	97%
Jun '03	394	331	84%
Jul '03	452	437	97%
Aug '03	306	299	98%
Sep '03	426	416	98%
Oct '03	500	483	97%
TOTAL	**4867**	**4675**	**96%**

Q. WHAT PERCENTAGE OF THE UNE LOOP LSRS SUBMITTED BY THE CLECS IN THE LAST 12 MONTHS IN ALABAMA FLOWED THROUGH BELLSOUTH'S OPERATION SUPPORT SYSTEMS?

A. BellSouth does not measure the Flow Through measurement at the state level. Beginning in March 2003, BellSouth in Georgia separated the UNE category into UNE-P and UNE Other disaggregations for Flow-Through. (UNE Other is defined as the total UNE LSRs minus the UNE-P LSRs.) BellSouth met 85.92% (85,951 of 100,038) of the submitted UNE Other LSRs during the period from March 2003 through October 2003 for the region. See Exhibit AJV-1 for the details concerning this measure

Q. WHAT DOES THE SERVICE INQUIRY WITH FIRM ORDER MEASURE ADDRESS AND HOW DID BELLSOUTH PERFORM?

A. This measure addresses a small group of services (*i.e.*, xDSL and Unbundled Interoffice Transport) that require BellSouth to check equipment availability before the CLEC can submit an LSR. BellSouth returned 67 of the 71 service inquiries (94%) within the 5-day interval specified by the Commission during the period of November 2002 through October 2003. See Exhibit AJV-1 for the details concerning this measure.

Q. WHAT WAS BELLSOUTH'S PERFORMANCE FOR UNE LOOPS ON THE MEASURES IN THE PROVISIONING CATEGORY OF THE SQM?

A. Excellent. The various provisioning measures address certain aspects of provisioning an individual order. For this reason, summary results based on the number of orders processed cannot be presented for provisioning measures like they are for the ordering measures. A cursory review of the data, however, by simply comparing the number of submetrics met, indicates the high level of performance as shown below.

% OF PROVISIONING SUB-METRICS MEETING PARITY			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Benchmarks**	**Percentage Meeting Benchmarks**
Nov '02	45	45	100%
Dec '02	47	47	100%
Jan '03	49	46	94%
Feb '03	43	41	95%
Mar '03	43	41	95%
Apr '03	50	43	86%
May '03	52	50	96%
Jun '03	59	56	95%
Jul '03	63	60	95%
Aug '03	50	46	92%
Sep '03	44	36	82%
Oct '03	52	44	85%
TOTAL	**597**	**555**	**93%**

BellSouth met the performance criteria for an average of 93% of all the UNE Loop provisioning sub-metrics over the last 12 months in Alabama. As shown above, BellSouth met 555 of the 597 sub-metrics with CLEC activity during the period.

The following table provides a detailed breakdown, by provisioning measure, of the measurements included in the overall summary above.

12-MONTH TOTAL FOR PROVISIONING MEASURES MEETING PARITY			
Measure	**Total # Submetrics with CLEC Activity**	**Total # Submetrics Meeting Parity**	**% Meeting Parity**
Mean Held Order Interval	146	143	98%
Average Jeopardy Notice Interval	21	20	95%
% Jeopardy Notice >= 48 Hours	21	19	90%
Coordinated Customer Conversions	8	7	88%
Order Completion Interval	67	62	93%
Hot Cut Timeliness	6	6	100%
% Provisioning Troubles within 7 Days of Hot Cut	9	8	89%
% Missed Installation Appointments	69	65	94%
% Provisioning Troubles within 30 Days of Completions	66	60	91%
Average Completion Notice Interval	64	62	97%
% Cooperative Test	12	12	100%
SOA	96	79	82%
% Trunk Blocking	12	12	100%

Q. BRIEFLY DESCRIBE THE NATURE OF THE ISSUES THAT CAUSED MOST OF THE MISSES REFLECTED IN THE ABOVE CHARTS.

A. Each of these provisioning results is discussed in more detail in Exhibit AJV-1. The analyses in that exhibit show that the misses for the most part

are not indicative of problems in BellSouth's performance. A brief summary of the principal causes of the performance misses follows.

Order Completion Interval

Four (4) of the 5 missed sub-metrics were due to small quantities of orders within the sub-metrics. The last item was a failure to exclude 3 orders that were missed for subscriber reasons.

% Missed Installation Appointments

For the 4 sub-metrics missed in this area, BellSouth typically only missed a small number of appointments. For example, for the 4 sub-metrics missed, 3 missed only 1 appointment each and the other missed 4 appointments.

% Provisioning Troubles<=30 Days

All nine of the missed sub-metrics occurred in cases where the volume was too low to indicate a problem with performance.

Service Order Accuracy

The percent of sub-metrics met is very misleading as an indicator of performance. Over 98% of the sample of orders reviewed met the accuracy test. While BellSouth did not meet all of the sub-metrics, it did meet or exceed the benchmark when the total number of LSRs sampled is calculated. For the design sub-metrics, BellSouth met 3,406 of the 3,473 sampled for over 98% accuracy. The non-design sub-metrics exceeded

the 95% benchmark as well with 9,085 of the 9,265 LSRs sampled meeting the accuracy requirement for over 98% also.

As you can see from these summaries, none of the misses are indicative of systemic problems and, in some cases, indicate no problem at all with performance. When this fact is considered along with the already high level of performance indicated by the raw measurement data, BellSouth's performance is exceptional.

Q. WHAT HAS BEEN BELLSOUTH'S PERFORMANCE FOR THE THREE LNP DISCONNECT TIMELINESS MEASURES FOR THE PAST SIX MONTHS IN ALABAMA?

A. The following table provides the average results for the three LNP measures: P-13B, the percentage of time BellSouth applies the trigger order before the due date; P-13C, the percentage of time the LNP service is out of service less than 60 minutes; and P-13D, the percentage of time BellSouth disconnects the LNP service within 4 hours for non-trigger orders for the months of May through October 2003 in Alabama. While these three LNP measures are not currently included in the Alabama SQM, I have included the results for these measures based on Alabama data.

The data show the number of lines meeting the requirement divided by the total lines due and the corresponding percentage calculated.

Month	% Trigger Orders Applied Before Due Date (P13B)	% Orders OoS < 60 Minutes (P13C)	% Non Trigger Orders Applies < 4 Hours (P13D)
May - October 2003	(6369/6753) 94%	(9876/9896) 99%	(1016/1059) 96%

See Exhibit AJV-1 for the specific details for these sub-metrics.

Q. HOW WAS BELLSOUTH'S UNE LOOP MAINTENANCE & REPAIR PERFORMANCE?

A. Excellent. BellSouth met 95% of the UNE Loop sub-metrics associated with the Maintenance & Repair measures included with this filing, and the overwhelming majority of the misses do not indicate performance problems. As shown in the following table, BellSouth met 455 of the 480 sub-metrics with CLEC activity during the period from November 2002 through October 2003. (See Exhibit AJV-1 for a detailed breakdown of the maintenance & repair sub-metrics for the UNE loops included in this table.)

% OF M&R SUB-METRICS MEETING PARITY			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Parity**	**Percentage of Submetrics Meeting Parity**
Nov '02	40	39	98%
Dec '02	40	39	98%
Jan '03	40	37	93%
Feb '03	40	38	95%

% OF M&R SUB-METRICS MEETING PARITY			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Parity**	**Percentage of Submetrics Meeting Parity**
Mar '03	40	38	95%
Apr '03	40	37	93%
May '03	40	37	93%
Jun '03	40	38	95%
Jul '03	40	38	95%
Aug '03	40	38	95%
Sep '03	40	37	93%
Oct '03	40	39	98%
TOTAL	**480**	**455**	**95%**

The following table provides a detailed breakdown by maintenance & repair measure of the measurements included in the overall summary above.

12-MONTH TOTAL FOR MAINTENANCE & REPAIR MEASURES MEETING PARITY			
Measure	**Total # Submetrics with CLEC Activity**	**Total # Submetrics Meeting Parity**	**% Meeting Parity**
% Missed Repair Appointments	120	119	99%
% Customer Trouble Report Rate	120	102	85%
Maintenance Average Duration	120	116	97%
% Repeat Troubles within 30 Days	120	118	98%

Q. BRIEFLY DESCRIBE THE PRINCIPAL ISSUES THAT CONTRIBUTED TO THE MISSED SUBMETRICS IN THE ABOVE CHART.

A. Like the provisioning measurements, these measurement results are also analyzed in Exhibit AJV-1. Following is a brief summary of the principal causes of these performance metric misses.

% Missed Repair Appointments and % Repeat Troubles

In all cases, the misses occurred where there was a very low volume of activity. Such low volumes do not indicate a problem with performance.

%Customer Trouble Report Rate

In all cases where a miss was recorded, high quality service was provided. In all cases, the level of trouble report free service was at least 96%. When service levels are this high, the statistical test used to evaluate performance is overly sensitive to service differences and records a miss even though service levels are high.

Maintenance Average Duration

The four missed sub-metrics were due to small volumes of troubles for the CLECs. There was 1 missed sub-metric in the UNE ISDN Loop and 3 in the Local Interconnection Trunk categories. There were 9 troubles reported for the ISDN miss and a total of 8 troubles for the trunk categories.

C. Cross-Connect Performance

Q. THE FCC SPECIFICALLY MENTIONED CLEC-TO-CLEC CROSS-CONNECT PROVISIONING PERFORMANCE AS AN AREA FOR REVIEW. SINCE BELLSOUTH CURRENTLY DOES NOT PROVIDE A CO-CARRIER CROSS-CONNECT PRODUCT, HOW CAN THE COMMISSION BE CONFIDENT THAT BELLSOUTH'S PERFORMANCE IN THIS AREA WILL NOT CAUSE CLECS TO BE IMPAIRED IF UNE-P IS NOT AVAILABLE?

A. The Commission may infer from BellSouth's current performance in providing cross-connects for existing applications such as UNE Loops what its performance would likely be for co-carrier cross-connects. Notably, the loop provisioning data previously discussed includes performance in provisioning all cross connects necessary to make the UNE loop available. The cross connects required to provide a UNE loop are not ordered separately from the loop itself, but instead are a part of the UNE loop product. Consequently, the performance data for such cross-connects is not separated from the data for the other parts that make up the UNE loop products. In the case where a CLEC orders a new loop from BellSouth, the cross-connect activity associated with completing the order is a part of the reported results as provided in this filing. If a CLEC order requires this loop to be provided via a hot cut, the cross-connect activity is included in the performance results for hot cuts, as reported today and as proposed in this filing.

As previously stated in this testimony, the cross-connect process is a very basic procedure that BellSouth performs frequently on an ongoing basis. There is no appreciably greater difficulty involved in providing a co-carrier cross-connect as compared to a cross-connect between BellSouth and a CLEC. A cross-connect is a cross-connect. Therefore, based on current performance, as provided in this filing, the Commission should be confident that it has everything necessary to assess whether CLECs would be impaired in the absence of unbundled switching.

D. Collocation Performance

Q. HOW WELL HAS BELLSOUTH PERFORMED IN PROVIDING COLLOCATION SPACES?

A. The following table shows that BellSouth met 95% of all collocation measures during the 12-month period. (See Exhibit AJV-1 for further details concerning the data included in this table.)

% OF COLLOCATION SUB-METRICS MEETING BENCHMARK			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Parity**	**Percentage Meeting Parity**
Nov '02	5	2	40%
Dec '02	5	5	100%
Jan '03	4	4	100%
Feb '03	4	4	100%
Mar '03	7	7	100%
Apr '03	5	5	100%
May '03	3	3	100%
Jun '03	6	6	100%
Jul '03	6	6	100%
Aug '03	1	1	100%

% OF COLLOCATION SUB-METRICS MEETING BENCHMARK			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Parity**	**Percentage Meeting Parity**
Sep '03	6	6	100%
Oct '03	4	4	100%
TOTAL	**56**	**53**	**95%**

From the foregoing results, it is clear that CLECs do not face operational barriers based on BellSouth's performance in providing timely collocation. BellSouth's provision of collocation is discussed further in the testimony of BellSouth witness Wayne Gray.

II. BELLSOUTH'S CURRENT HOT CUT PERFORMANCE DATA

Q. PLEASE IDENTIFY THE PERFORMANCE MEASUREMENTS THAT BELLSOUTH CURRENTLY REPORTS RELATIVE TO HOT CUT ORDERS.

A. BellSouth currently captures its performance results relative to Hot Cuts and Coordinated Customer Conversions (CCC) via four measures listed in the Alabama SQM:

- P-7: Coordinated Customer Conversion Interval
- P-7A: Coordinated Customer Conversions – Hot Cut Timeliness % within Interval and Average Interval
- P-7B: Coordinated Customer Conversions – Average Recovery Time
- P-7C: Hot Cut Conversions - % Provisioning Troubles Received within 7 days of Completed Service Order

Q. WHAT TYPES OF HOT CUTS ARE INCLUDED IN THE PERFORMANCE DATA?

A. Currently, BellSouth's performance results for measures P-7, P-7A and P-7B only include data for coordinated hot cuts as reflected by the title of the measurements. As originally designed, these Commission-approved hot cut measurements only capture coordinated conversions, which account for the vast majority of conversions requested by CLECs. Further, the data necessary to calculate these measures are only available on coordinated hot cuts. The P-7C measurement should include coordinated and non-coordinated hot cuts; however, only data for coordinated hot cuts was being included. The measure will be corrected to include non-coordinated cuts beginning in January 2004, as reflected in the Preliminary January 2004 Notification Report filed on November 3, 2003 in Georgia and December 29, 2003 in Alabama (Docket 25835). Analysis included in that preliminary report indicated that correcting this error would have a 0.005% positive impact on results (based on May 2003 data).

Q. YOU INDICATED THAT COORDINATED CONVERSIONS ACCOUNT FOR THE VAST MAJORITY OF CONVERSIONS THAT CLECS REQUEST. PLEASE ILLUSTRATE THE COMPARATIVE VOLUMES OF COORDINATED VERSUS NON-COORDINATED CONVERSIONS.

A. Over the 12-month period from November 2002 to October 2003, 100% of the hot cuts in Alabama were coordinated. Moreover, for the one

measure, P-7C, that should include non-coordinated hot cuts, not only is the volume small throughout BellSouth's region, but based on the measurement impact assessment included in the January 2004 Notice (filed December 1, 2003) for May 2003 data, there were only 17 non-coordinated conversions for the region that were not reported, none of which had troubles.

Q. WHAT OPERATIONS ACTIVITIES ARE COVERED BY THESE MEASUREMENTS?

A. These measurements capture four discrete operational aspects of the hot cut process. The hot cut process is discussed at length in the testimony of BellSouth witness Ken Ainsworth, including the activities briefly described here. The first measure P-7, *Coordinated Customer Conversions Interval*, is used to report the time interval from the point at which BellSouth disconnects an unbundled loop from the BellSouth switch until the loop is cross connected to the CLEC collocation space. The interval within which BellSouth is expected to complete the cutover of a given loop is 15 minutes and, in order to meet the requirements of this metric, BellSouth must complete the cutover of 95% of the unbundled loops within this 15 minute standard. The 15-minute standard does not include the time to notify the CLEC. BellSouth has an objective, however, to notify the CLEC within 5 minutes of completion of coordinated hot cuts. BellSouth consistently meets this objective because the Customer Wholesale Interconnect Network Services (CWINS) center monitors each coordinated

hot cut and knows when it is completed so that the CLEC can be notified. BellSouth's performance related to this notification interval is addressed in the testimony of BellSouth witness Mr. Ken Ainsworth.

While measure P-7 captures the time required to complete the cutover, measure P-7A, *Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval*, provides an indication of whether or not BellSouth began the cutover in a timely matter. Specifically, if BellSouth begins the cutover more than 15 minutes before the scheduled start time or more than 15 minutes after the scheduled start time, the metric is considered missed.

Measure P-7B, *Coordinated Customer Conversions – Average Recovery Time*, addresses those situations where a service outage due to the cutover is isolated to BellSouth's side of network, prior to completion of the service order. The time that it takes BellSouth to resolve the service outage after notification by the CLEC is reported via this measure. The Commission determined that this measure should be diagnostic.

Finally, measure P-7C, *Hot Cut Conversions - % Provisioning Troubles Received within 7 Days of a Completed Service Order*, is designed to assess the quality of the work performed for coordinated cutovers by capturing the number of troubles that occur within 7 days of the cutover. This measure is calculated as the percentage of circuits associated with coordinated conversions that incur troubles within 7 days of the service

order completion. The standard established by the Commission requires that CLECs should experience troubles on only 5% or less of the circuits involved in the cutover.

In summary, BellSouth's current set of measurements is comprehensive with respect to customer conversions/hot cuts, in that the data reflects performance on the important aspects of the process for the overwhelming majority of hot cuts. Particularly, BellSouth measures and reports: (1) whether the cutover started on time (P-7A: *Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval*); (2) how long it takes to complete the cutover (P-7: *Coordinated Customer Conversions Interval*); (3) if service outage problems are encountered after the cutover, but before service order completion, the time it takes to resolve the problem (P-7B: *Coordinated Customer Conversions – Average Recovery Time*); and (4) after the service order is completed, any problems identified within a short time after the cutover associated with circuits involved in the cutover are tracked (P-7C: *Hot Cut Conversions - % Provisioning Troubles Received within 7 Days of a Completed Service Order*).

Q. WOULD YOU DESCRIBE BELLSOUTH'S OVERALL PERFORMANCE FOR HOT CUTS FOR THE PAST 12 MONTHS IN ALABAMA?

A. BellSouth's hot cut performance is exemplary. Exhibit AJV-1 contains detailed information regarding hot cut performance. Reviewing the three

SQM Hot Cutover measures that capture the timeliness and accuracy of the conversion (Coordinated Customer Conversions, Hot Cut Timeliness and Provisioning Troubles within 7 days of Cutover), BellSouth met the standard for 21 of the 23 sub-metrics with CLEC activity from November 2002 through October 2003. BellSouth met the standard for 91% of all sub-metrics with CLEC activity for hot cuts for the past 12 months in Alabama. The following table lists the number of sub-metrics with CLEC activity that met the ordered benchmark, the total number of sub-metrics with CLEC activity, and the corresponding percentage of sub-metrics meeting the ordered benchmark for the past 12 months.

% OF HOT CUT SUB-METRICS MEETING BENCHMARK			
Month	**Total # Submetrics with CLEC Activity**	**# Submetrics Meeting Benchmark**	**Percentage of Submetrics Meeting Benchmark**
Nov '02	1	1	100%
Dec '02	2	2	100%
Jan '03	3	2	67%
Feb '03	3	2	67%
Mar '03	1	1	100%
Apr '03	2	2	100%
May '03	3	3	100%
Jun '03	3	3	100%
Jul '03	3	3	100%
Aug '03	2	2	100%
Sep '03	0	0	
Oct '03	0	0	
TOTAL	**23**	**21**	**91%**

Q. HOW DID BELLSOUTH PERFORM IN MEETING THE 15-MINUTE BENCHMARK FOR CUSTOMER COORDINATED CONVERSIONS OVER THE PAST 12 MONTHS IN ALABAMA?

A. The following table provides a month-by-month breakdown of the coordinated customer conversions for Alabama from November 2002 through October 2003. BellSouth met the performance standard for over 94% of all coordinated conversions during this period and averaged 7 minutes and 36 seconds per cutover for the over 60 coordinated conversions. (See Exhibit AJV-1 for detailed explanation of this data) As already noted, the Coordinated Customer Conversion Interval does not include the time to notify the CLEC. As will be discussed later in this testimony, because the CLECs have requested that the interval include the time to notify, BellSouth proposes to modify measure P-7, Coordinated Customer Conversion Interval, to include the time to notify the CLEC that the conversion has been completed. This modification to the measurement should only impact the performance results slightly, if at all, because the CWINS center notifies the CLEC within 5 minutes of the cutover.

% OF COORDINATED CUSTOMER CONVERSIONS MEETING BENCHMARK				
Month	**Total # Hot Cuts**	**# Hot Cuts Meeting Benchmark**	**Percentage Meeting Benchmark**	**Average Cutover Interval**
Nov '02	4	4	100%	3:00
Dec '02	7	7	100%	1:00
Jan '03	19	15	79%	21:22
Feb '03	1	1	100%	3:00
Mar '03	0	0		

% OF COORDINATED CUSTOMER CONVERSIONS MEETING BENCHMARK				
Month	**Total # Hot Cuts**	**# Hot Cuts Meeting Benchmark**	**Percentage Meeting Benchmark**	**Average Cutover Interval**
Apr '03	17	17	100%	3:12
May '03	5	5	100%	2:54
Jun '03	2	2	100%	2:27
Jul '03	9	9	100%	2:31
Aug '03	0	0		
Sep '03	0	0		
Oct '03	0	0		
TOTAL	**64**	**60**	**94%**	**7:36**

III. BELLSOUTH'S PROPOSED ENHANCEMENTS TO THE PERFORMANCE MEASURES AND SEEM PLAN

Q. DOES BELLSOUTH PLAN TO MAKE CHANGES TO ITS PERFORMANCE MEASUREMENTS TO ADDRESS BATCH HOT CUTS SPECIFICALLY IF IT RECEIVES RELIEF FROM UNBUNDLED CIRCUIT SWITCHING?

A. Yes. There are a few hot cut processes that are either not covered by the existing measurements or, given the anticipated volume of hot cuts if switching is no longer required, that this Commission may want to monitor more closely. First, BellSouth does not currently measure certain pre-ordering and ordering functions for Batch Hot Cuts, in part because they are project managed. Therefore, BellSouth proposes to add a new Pre-Ordering measure to capture its performance in the initial stage of processing a CLEC request for a batch conversion. BellSouth also proposes to modify four of the Ordering measurements to include project

managed batch hot cuts that were previously excluded. BellSouth's Exhibit AJV-2 contains the proposed changes to the current Alabama performance measurements to incorporate batch hot cuts. Additions to the existing performance measures are shown in the Exhibit AJV-2 as red underlined text and deletions are as blue strike-through. For the new measures that BellSouth proposes to add to the Alabama SQM, the entire SQM page is reflected as red underlined text in the exhibit.

As previously discussed, the existing hot cut timeliness measures P-7 and P-7A only record data for coordinated hot cuts. In fact, the data necessary to produce these measurements are only available for coordinated hot cuts. It is not clear whether CLECs will elect to use coordinated or non-coordinated hot cuts to convert customers from UNE-P to UNE-L if switching is no longer a UNE. Therefore, BellSouth proposes to add one new provisioning measure to capture BellSouth's performance on non-coordinated cutovers. Finally, there is one change in the existing coordinated customer conversion interval measure to include the time to notify the CLEC that the cutover has been completed.

Q. PLEASE DESCRIBE A BATCH HOT CUT FROM THE PERSPECTIVE OF WHAT BELLSOUTH PROPOSES TO MEASURE.

A. Mr. Ainsworth describes batch hot cuts in detail, so I will only briefly focus on those aspects of the batch hot cut process that would be measured. Also, it should be noted that throughout this testimony the terms "batch"

hot cut and “bulk” hot cut will be used interchangeably. A batch hot cut is like any other hot cut except for the preordering and ordering processes. For batch hot cuts, the process is designed to facilitate ordering large volumes of loop hot cuts simultaneously. The batch hot cut process begins with submission of a Bulk Migration Notification Form by the CLEC wherein due dates for many different accounts can be requested at one time. Submission of this form initiates the preordering process and a unique project number is assigned ending in the characters “BULK”.

For batch hot cuts, a project manager is assigned at the time of the CLEC’s initial request, and follows the project until completion. BellSouth forwards the information provided by the CLEC to each of the groups required to analyze the data and establish due dates, which are returned to the CLEC. BellSouth then provides this information to the CLEC.

After the CLEC receives the preordering information from BellSouth, the CLEC begins placing orders. The CLEC can consolidate UNE-P hot cuts for up to 99 accounts, with each account containing up to 25 lines on a single batch LSR. BellSouth’s systems convert each batch LSR into single LSRs for processing and service order issuance. Each individual LSR spawned by the batch LSR contains the unique project number assigned during the preordering process. The individual LSRs resulting from the batch LSR are treated similarly to any other hot cut LSR for operational purposes.

Q. TO WHAT EXTENT ARE BATCH HOT CUT RESULTS INCLUDED IN THE EXISTING PERFORMANCE MEASURES AND THE SEEM PLAN?

A. While batch hot cuts are not currently included in ordering measurement results, they are reflected in other measurements where applicable. Specifically, coordinated batch hot cuts would be included in the four hot cuts measures that were discussed previously (*i.e.*, P-7, P-7A, P-7B and P-7C). For designed loops, CLECs are required to request order coordination on batch hot cuts. In cases where the loops ordered are not designed, CLECs can order batch hot cuts with or without order coordination. Therefore, the measures P-7, P-7A and P-7B, would currently include batch hot cuts except in those case where CLECs choose not to request order coordination for non-design loops. Both coordinated and non-coordinated batch hot cuts also show up in measures such as: P-3, *Percent Missed Installation Appointments*; P-8, *Percent Provisioning Troubles within 30 Days of Service Order Completion*; M&R-1, *Missed Repair Appointments*; M&R-2: *Customer Trouble Report Rate*; and M&R-3, *Maintenance Average Duration*.

Further, for situations where the hot cut is associated with a number port (this permits the telephone number to be ported so that the end user can keep the same telephone number with the new carrier), LNP measures also apply. Specifically, hot cuts are already included in LNP measurements such as: P-13B, *LNP - Percent Out of Service < 60 Minutes*; P-13C, *Percentage of Time BellSouth Applies the 10-Digit*

Trigger Prior to the LNP Order Due Date; P-13D, *LNP- Average Disconnect Timeliness Interval (Non-Trigger)*. These LNP measures are not currently part of the Alabama SQM; however, I have provided the performance results for these measures based on Alabama data.

Q. PLEASE DISCUSS THE NEW PRE-ORDERING MEASUREMENT THAT BELLSOUTH PLANS TO ADD TO ITS SQM, IF IT RECEIVES UNBUNDLED SWITCHING RELIEF.

A. BellSouth proposes to add a Pre-Ordering measure, PO-3, *UNE Bulk Migration – Response Time*, if it receives unbundled switching relief. This proposed measurement is designed to capture the time that it takes for BellSouth to provide the requesting CLEC with a response to its UNE Bulk Migration Notification Form, which begins prior to the creation of an LSR. The submittal of this form by the CLEC triggers the assignment of a project manager to this request who handles providing a timely response back to the CLEC. The interval being measured begins upon receipt of the UNE Bulk Migration Notification Form by BellSouth and ends when a response is transmitted back to the CLEC. To meet the performance standard, BellSouth must provide a response to the CLEC within 7 business days for bulk migration requests of less than 99 individual LSRs and within 10 business days for 100 to 199 individual LSRs. Because the intervals for 200 or more LSRs are negotiated, no benchmark applies. The details of this measure are included in Exhibit AJV-2. Because processing of the Bulk Migration Notification Form is the only Ordering or

Pre-Ordering process that is not covered by existing measurements, no additional measurements of ordering or pre-ordering are proposed.

Q. WHAT REVISIONS TO ORDERING MEASURES ARE BEING PROPOSED BY BELLSOUTH?

A. As previously discussed, batch hot cuts are currently excluded from measures of the Ordering processes because they are project managed. Project managed orders are those orders which require more detailed and specific information from the CLEC in order to manage the cycle from service request to service completion. Specifically, these orders are of a level of complexity that requires the assignment of a project manager to oversee the order from beginning to end. The Ordering measures carry an exclusion for orders that are project managed because project managed orders are not considered in the normal flow of order types that can be responded to by BellSouth according to standard and well-established time frames. Typically, the timeframes for responding to such orders are non-standard, so they do no lend themselves to evaluation via an objective standard. Consequently, ordering data produced for the typical project managed order does not provide any insight on the quality of BellSouth's performance.

Hot cuts can be included in the ordering measures, however, even though they are project managed because project management of Batch migrations does not affect the timeframes for processing the underlying

LSRs after they are generated. Thus, the variability and uniqueness normally associated with project managed LSRs generally do not apply to Batch migrations once the individual LSRs are generated. These LSRs also have a unique project identifier that facilitates inclusion in the ordering measures by permitting them to be separately identified from other projects. BellSouth proposes to modify the exclusion for projects in the ordering measures to include batch migration LSRs. This Ordering measurement change is reflected in the Alabama SQM for the following measures, attached as Exhibit AJV-2:

- O-7: Percent Rejected Service Requests
- O-8: Reject Interval
- O-9: Firm Order Confirmation Timeliness
- O-11: Firm Order Confirmation and Reject Response Completeness

An additional change is required to account for the unique type of LSR that a CLEC can submit in this case. Instead of submitting separate LSRs for each account that the CLEC wants to transfer, up to 99 accounts can be submitted on a single "Global" LSR. BellSouth's systems convert this Global LSR into multiple separate LSRs needed to create service orders to provision the services. This process is unique to batch migrations. For these batch migration LSRs, the start time will be receipt of the Global LSR, so the same incoming timestamp will apply to each LSR spawned by the Global LSR. The Global LSR, however, should not be included in the count of LSRs because the individual LSRs resulting from the Global LSR are the items that receive the reject or FOC responses that are tracked in

reported results. The ordering measurements O-8 and O-9 should be modified to reflect this fact.

Q. DOES BELLSOUTH PROPOSE ANY NEW MEASUREMENTS FOR THE PROVISIONING PROCESS?

A. Yes. To display whether BellSouth meets its provisioning obligations for noncoordinated hot cuts, a new provisioning measure, P-7E, *Non-Coordinated Customer Conversions - % Completed and Notified on Due Date*, is proposed.

Specifically, this new measure would provide results indicating whether BellSouth completes a non-coordinated customer conversion on the due date and provides notification of completion to the CLEC on the same date. This is the obligation that BellSouth makes to CLECs on non-coordinated hot cuts. This measure is also proposed to be included in both Tier 1and Tier 2 of SEEM.

Q. WHAT DOES BELLSOUTH PROPOSE TO CHANGE FOR EXISTING PROVISIONING MEASURES?

A. The relevant Provisioning measures currently include projects and, consequently, also include batch hot cuts. Thus, there is no need to change the existing provisioning measures to capture batch hot cuts. BellSouth is, however, proposing the modification of measure P-7,

Coordinated Customer Conversions Interval, to include the time to notify the CLEC that BellSouth has completed the conversion (see Exhibit AJV-2). This is an issue raised by the CLECs that BellSouth's hot cut interval does not include the time to notify the CLEC that the transfer is complete.

The current established standard for the conversion interval is 15 minutes per line. The objective time to notify the CLEC that the cutover has been completed is 5 minutes. Therefore, in adjusting this measure to include the time to notify the CLEC, the proposed standard conversions interval is changed from 15 minutes per line to 20 minutes per line. The proposed changes to this measure are included in Exhibit AJV-2.

Q. YOU HAVE PROPOSED CHANGES TO CERTAIN MEASURES OR THE ADDITION OF MEASURES IN THE PRE-ORDERING, ORDERING AND PROVISIONING CATEGORIES, BUT NO CHANGES TO MAINTENANCE AND REPAIR. WHY IS THIS?

A. While there are certain activities particular to batch hot cuts in some of the Pre-Ordering, Ordering and Provisioning processes, there is nothing in the Maintenance & Repair process that would distinguish a line associated with a batch hot cut from any other line. Once the lines associated with the batch hot cut have been converted, the process necessary to report a line trouble and the process necessary to resolve a line trouble are exactly the same as for any other lines.

Q. HOW WILL BELLSOUTH'S PROPOSED CHANGES TO THE PERFORMANCE MEASUREMENTS IMPACT SEEM?

A. Any existing measurements that BellSouth has proposed to change that are currently in SEEM will remain in SEEM. Any new data that will be reflected in those measurements will be added to one of the existing SEEM disaggregations. The new measurement, P-7E, that BellSouth proposes to add to the Alabama SQM is also proposed as a new measurement in the SEEM plan in both Tier 1 and Tier 2. Exhibit AJV-3 includes the proposed changes to the SEEM plan and are reflected as red underlined text.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.